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BY ECF

Honorable Colleen McMahon
United States District Court
Southern District of New York
500 Pearl Street, Room 24A
New York, New York 10007

Re: Marina Brown v. New York City, et al.
Civil Action No.: 20-cv-10948 (CM)

January 26, 2021

MEMO ENDORSED
1/26/21 OK

Colleen McMahon

Dear Judge McMahon:

I am the Assistant Corporation Counsel in the Office of James E. Johnson, Corporation Counsel of the City of New York, assigned to represent defendants City of New York (“City”) and the New York City Department of Education (“DOE”) (collectively, “Defendants”) in the above-referenced action. I write to respectfully request a 45-day extension of time, from January 28, 2021 to March 15, 2021, for Defendants to respond to the complaint. This is Defendants’ first request for an extension of time and Plaintiff’s counsel has consented to this request. There are no other dates previously scheduled after the original date.

This extension is requested to provide this office with sufficient time to thoroughly investigate the allegations contained in the complaint and to formulate an appropriate response. In addition, this office must identify, locate, and review any documents relevant to Plaintiff’s claims.

Thank you for your consideration of this matter.

Respectfully Submitted,

/s/
Laura C. Williams
Assistant Corporation Counsel

cc: Ethan Leonard, Esq. (by ECF)
The Law Offices of Neal Brickman, PC
Attorneys for Plaintiff